## THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Chad M Archer and : Chapter 13

Emily Archer, : No.: 19-16854-mdc

Debtors :

## **CERTIFICATE OF NO RESPONSE**

The undersigned does hereby certify:

- 1. That I am the attorney for Chad M Archer and Emily Archer, Debtors in the above- captioned matter.
- 2. That a Motion to Approve a Mortgage Loan Modification by and between Debtors and Freedom Mortgage Corporation was filed with this Court on January 7, 2022.
- 3. That a copy of the Motion and Notice of Motion was served upon parties in interest on January 7, 2022.
- 4. A certificate of service was filed with the Court on January 7, 2022 declaring timely service to the above-referenced parties.
- 5. A response deadline was set as January 28, 2022.
- 6. No response to said Motion has been received as of January 31, 2022.

Respectfully Submitted,

## ROSS, QUINN & PLOPPERT, P.C.

By: <u>/s/ Joseph L. Quinn,</u> Joseph L. Quinn,

Esquire Attorney for

Debtor

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Dated: January 31, 2022